REMARKS/ARGUMENTS

Reconsideration and allowance of this application are respectfully requested. Currently, claims 1-29 are pending in this application.

Rejection under 35 U.S.C. § 103

Claims 1-22 were rejected under 35 U.S.C. § 103 (a) as allegedly being unpatentable over Gryphon (U.S. '537, hereinafter "Gryphon") in view of Ernst (U.S. '133). Applicant respectfully traverses this rejection.

In order to establish a prima facie case of obviousness, all of the claim limitations must be taught or suggested by the prior art. The combination of Gryphon and Ernst fails to teach or suggest all of the claim limitations. For example, the combination fails to teach or suggest each non-generic process element containing an instruction determining how its content is to be woven into the generic process plan at run-time as required by independent claims 1 and 10 and their respective dependents. This claim limitation is supported by, for example, page 3, lines 12-15, page 7, lines 12-13, and page 8, lines 24-30 of the originally-filed specification.

Gryphon teaches a modeling system for visual presentation of business applications composed of multiple "plan elements." The modeling language is organized around a set of defined pictograms, each capable of representing elements of an application in progressively finer detail. Each pictogram (referred to as a "plan"), describes the attributes and relationships of a single planned

process. Each pictogram represents an element primitive which is independently adjustable, and can be modified or enhanced without damage to the overall process because each element represents a delegation of a task primitive (including data storage). (See col. 1, lines 53-64). The visual business modeling language (Visual BML) disclosed by Gryphon is simply a method of graphical notation that can be used to represent business process knowledge and the corresponding business information that comprises the business model. It does not directly relate to any semantic elements in a programming language. Indeed, Visual BML may apply to hand-drawn models drawn in ink on paper or chalk on a blackboard. (See col. 8, lines 21-25).

According to exemplary embodiments of the invention, a process can be decomposed into generic process plans and process aspects (non-generic process elements). Specialized processes may be generated from generic process plans forming generic cores and non-generic process elements forming context dependent elements. A generalized process plan is a decontextualised, generalized plan and non-generic process elements provide context, resource and participant dependent exceptions and extensions.

The specification describes the term "process plan" as "a generic process pattern 300, a core process that must be executed in order to achieve a type of goal, comprises a set of processes that has been loaded to the system...." (See page 7, lines 25-28 of the specification). The process aspects are context

dependent process steps that should be carried out in order to achieve a particular

goal. (See page 7, lines 29-30 of the specification). The process aspects used are

a subset of an overall available set of aspects and the process context determines

their use.

According to exemplary embodiments of the invention, process steps are

not just appended onto another process. In the present invention, content from a

non-generic process element is inserted into a generic process plan according to

instructions (i.e., weaving rules) coded into the non-generic process elements

themselves. Nothing in Gryphon teaches the element primitives providing such

coded instructions.

Moreover, Gryphon states "all of the other connected primitives are aware

simply of what is passed into or taken out of a neighbor primitive, not how that

primitive accomplishes its task." (See col. 1, lines 62-65). However, according to

certain features of the present invention, non-generic process elements can

introduce new process steps (see dependent claims 19, 21, 25 and 28) or *advise*

existing process steps (i.e., they can advise other aspects) (see dependent claims

20, 22, 26 and 29). This is clearly beyond the scope Gryphon's teachings.

Gryphon thus essentially teaches a method of pictorially representing

process steps. In contrast, Ernst describes how the dynamic behavior of the flow of

business processes can be considered when optimizing the business process.

However, the term "dynamic" here is used in the sense of "changing over the

course of time" rather than in the computational sense of at run-time (as opposed

to the computer compile time). Ernst also uses the term "run-time", but again this

is in a non-computational context to refer to the total time a particular business

process takes to be executed.

Moreover, Ernst describes in col. 6, lines 32-37, that a workflow

component is described as an activity in the process flow, which the Office Action

appears to have equated to the claimed non-generic process element. However, in

Ernst, each component of a workflow is a parameter. (See col. 6, lines 33-34 of

Ernst). Level settings indicating the various implementations of the parameters of

a business process instance are described by a set of attributes. However, there is

no coded information in the "workflow component" which provides an instruction

as to how it should be implemented in the overall business process. In Ernst, each

modification of a workflow component or resource is treated like an additional

level setting which initiates a further update of the attribute values to dynamically

optimize the workflow. (See col. 7, lines 17-23). However, a level setting

contains only information relating to the level of utilization of the parameter

values it describes. It does not contain any instructions placing it in a particular

context in the overall workflow. Ernst simply updates the attribute values in each

of the level settings of a particular workflow component. Ernst does not determine

how content is merged at the run time of the generic process plan (i.e., how the

workflow components such as activities are incorporated into the overall business process).

In Ernst, equating an activity to a "non-generic process element" does not teach that each workflow component should provide instructions which update an overall process plan with content relevant to that activity at run-time of the program constructing a process workflow. Each activity merely comprises a particular set of attributes and values. There is nothing in each activity providing instructions on how it should be merged into the overall process plan. (See the examples in col. 6, lines 41-46 and 56-59 of Ernst).

Accordingly, even if Ernst and Gryphon were combined as proposed by the Office Action, the combination would not have taught or suggested all of the claim limitations. The hypothetical Ernst/Gryphon combination therefore does not provide a solution to the problem of how to generate and modify task sequences and content so that meta-information on the current context of a business process affecting its structure, can be woven into a generic business process at run-time. In contrast, the present invention provides a solution that effectively simplifies what was previously a complex programming task, by structuring the particular non-generic process elements in such a way that they contain the necessary instructions to merge their content into a business process in a correct manner. (See, e.g., page 8 lines 30-34 of the specification).

Accordingly, Applicant respectfully requests that the rejection under 35 U.S.C. §103 over Gryphon in view of Ernst be withdrawn.
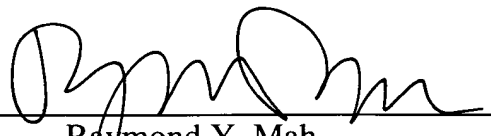
New Claims:

New claims 23-29 have been added to provide additional protection for the invention. Each of these claims depends directly or indirectly from either independent claim 1 or 10 and are thus allowable for at least the reasons discussed above with respect to these independent claims.

Conclusion:

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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